UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

IN RE ALTA MESA RESOURCES, INC. SECURITIES LITIGATION

Civil Action No. 4:19-cv-00957

DECLARATION OF STEPHEN JOHNSON IN SUPPORT OF CLASS PLAINTIFFS' MOTION TO BIFURCATE AND TO PRECLUDE EVIDENCE AS TO INDIVIDUALIZED ISSUES, INCLUDING TESTIMONY BY CLASS REPRESENTATIVES, DURING THE CLASS-WIDE PHASE OF TRIAL

- I, Stephen Johnson, declare as follows:
- 1. I am a member of the State Bar of California and am admitted *pro hac vice* to practice before this Court. I am an attorney associated with the law firm of Robbins, Geller, Rudman & Dowd LLP, counsel for Class Plaintiffs and Court-Appointed Co-Class Counsel.
- 2. I respectfully submit this declaration in support of Class Plaintiffs' Motion to Bifurcate and to Preclude Evidence as to Individualized Issues, Including Testimony by Class Representatives, During the Class-Wide Phase of Trial ("Motion"), contemporaneously filed herewith.
- 3. I have personal knowledge of the facts set forth herein, and if called to testify as a witness thereto, could and would do so competently under oath.
- 4. Defendants, in confirming their opposition to this Motion, indicated their intent to call five Class Plaintiffs to the stand and to present evidence of Class Plaintiffs' trading history, including trading records.
 - 5. Attached hereto are true and correct copies of the following documents:
 - Exhibit 1: Stipulation and Order Concerning Trial Procedures and Evidentiary Issues, *In re Twitter, Inc. Sec. Litig.*, No. 4:16-cv-05314, Dkt. 499 at 4 (N.D. Cal. May 8, 2020);
 - Exhibit 2: Transcript of Proceedings, *In re Longtop Fin. Techs. Ltd. Sec. Litig.*, Case No. 1:11-cv-03658, Dkt. 35 at 16-17 (S.D.N.Y. Oct. 29, 2014);
 - Exhibit 3: Order Regarding Reliance Issue, *In re Vesta Ins. Grp. Inc. Sec. Litig.*, No. 2:98-cv-01407, Dkt. 459 (N.D. Ala. Aug. 20, 2008);
 - Exhibit 4: Amended Minute Order, *In re JDS Uniphase Corp. Sec. Litig*, No. 4:02- cv-01486, Dkt. 1692 (N.D. Cal. Oct. 9, 2007);
 - Exhibit 5: Pretrial Conference Transcript, Lawrence E. Jaffe Pension Plan v. Household Int'l, Inc., No. 1:02-cv-5893, Dkt. 2282 (N.D. Ill. Dec. 21, 2016); and

Exhibit 6: Civil Minutes, *Hsu v. Puma Biotechnology, Inc.*, No. 8:15-cv-00865, Dkt. 614 at 5 (C.D. Cal. Oct. 24, 2018).

I declare under penalty of perjury that the foregoing is true and correct. Executed on September 6, 2024, at San Diego, California.

TEPHEN JOHNSON